

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

IN THE MATTER OF:  
Brian Thomas Crooks,  
Beth Haynes,  
  
Debtors.

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)  
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CASE NO.: **09-69160-JRS**

CHAPTER: **13**

**NOTICE OF FILING OF MODIFICATION OF CONFIRMED PLAN,  
DEADLINE FOR FILING WRITTEN OBJECTIONS AND HEARING DATE  
AND TIME IF OBJECTION IS TIMELY FILED**

**To: Creditors and Other Parties in Interest**

**PLEASE TAKE NOTICE** that Debtor has filed a proposed modification to the confirmed plan in this case, a copy of which modification you are receiving with this Notice or have recently received by mail. Pursuant to Rule 3015(g) of the Federal Rules of Bankruptcy Procedure, any creditor or other party in interest opposing this proposed Modification must file that objection in writing with the Court on or before the following deadline.

**DEADLINE FOR FILING OBJECTION:** Twenty-four (24) days after the date on which this proposed Modification was filed. The proposed modification was filed on May 25, 2011. If the twenty-fourth day after the date of filing falls on a weekend or holiday, the deadline is extended to the next business day.

**PLACE OF FILING:** Clerk, United States Bankruptcy Court  
Room 1340 United States Courthouse  
Richard B. Russell Building  
75 Spring Street, SW  
Atlanta, GA 30303-3367

If you mail an objection to the Court for filing, you must mail it early enough so the Court will receive it on or before the deadline stated above.

You must also serve a copy on the undersigned at the address stated below and on the Debtor at: 26 Whitebark Lane Bluffton, SC 29909.

**PLEASE TAKE FURTHER NOTICE** that if an objection to the proposed Modification is timely filed the Court will hold a hearing on the modification on **June 30, 2011 at 10:15 AM in Courtroom 1404**, US Courthouse, 75 Spring Street, Atlanta, GA. **If no objection is timely filed, the Court may approve the proposed modification without further notice or hearing.**

Dated: Wednesday, May 25, 2011

By: Bebe Baxter /s/  
Bebe Baxter  
Attorney for Debtor  
GA Bar # 512038  
229 Peachtree Street  
International Tower, Suite 705  
Atlanta, GA 30303  
(404) 827-9799

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

IN THE MATTER OF:  
Brian Thomas Crooks,  
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Debtors.

CASE NO.: **09-69160-JRS**

CHAPTER: **13**

**POST MODIFICATION PLAN AND REQUEST FOR ITS APPROVAL**

Brian Thomas Crooks and Beth Haynes, Debtors, propose to modify the confirmed Chapter 13 Plan in this case as set forth below and request that this modification be approved.

Debtors, hereby modify this Chapter 13 which the Court confirmed on June 18, 2009, as follows:

1.

Paragraph 2 is amended to **delete** the following:

2. **Plan Payments and Length of Plan.** Debtor will pay the sum of **\$521.00** per **month** to Trustee by [ ] Payroll Deduction(s) or by [ X ] Direct Payment(s) for the applicable commitment period of **60** months, unless all allowed claims in every class, other than long-term claims, are paid in full in a shorter period of time. The term of this Plan shall not exceed sixty (60) months. *See* 11 U.S.C. § 1325(b)(1)(B) and 1325(b)(4). Each pre-confirmation plan payment shall be reduced by any pre-confirmation adequate protection payment(s) made pursuant to Plan paragraph 6(A)(i) and § 1326(a)(1)(C).

The following alternative provision will apply if selected:

\_\_\_ If checked, Plan payments will increase by \$\_\_\_\_\_ on \_\_\_\_\_, 20\_\_\_ upon completion or termination of \_\_\_\_\_.

2.

Paragraph 2 is amended to **add** the following:

2. **Plan Payments and Length of Plan.** Debtor will pay the sum of **\$585.00** per **month** to Trustee by [ ] Payroll Deduction(s) or by [ X ] Direct Payment(s) for the applicable commitment period of **60** months, unless all allowed claims in every class, other than long-term claims, are paid in full in a shorter period of time. The term of this Plan shall not exceed sixty (60) months. *See* 11 U.S.C. § 1325(b)(1)(B) and 1325(b)(4). Each pre-confirmation plan payment shall be reduced by any pre-confirmation adequate protection payment(s) made pursuant to Plan

paragraph 6(A)(i) and § 1326(a)(1)(C).

The following alternative provision will apply if selected:

\_\_\_ If checked, Plan payments will increase by \$\_\_\_\_\_ on \_\_\_\_\_, 20\_\_ upon completion or termination of \_\_\_\_\_.

Increase in Debtors' plan payment shall not increase the base balance owed in Debtors' Chapter 13 case.

Dated: Wednesday, May 25, 2011

Respectfully submitted,  
The Sandberg Law Firm

By: Bebe Baxter /s/  
Bebe Baxter  
Attorney for Debtor  
GA Bar # 512038  
229 Peachtree Street  
International Tower, Suite 705  
Atlanta, GA 30303  
(404) 827-9799

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

IN THE MATTER OF:  
Brian Thomas Crooks,  
Beth Haynes,  
  
Debtors.

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)

CASE NO.: **09-69160-JRS**

CHAPTER: **13**

**DECLARATION UNDER PENALTY OF PERJURY**

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information and belief.

\_\_\_\_\_/s/  
Brian Thomas Crooks

\_\_\_\_\_/s/  
Beth Haynes

May 25, 2011  
Date

Penalty for making a false statement or concealing property:

Fine of up to \$500,000 or imprisonment for up to 5 years or both. 18 U.S.C. '152 and '3571.

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

IN THE MATTER OF:  
Brian Thomas Crooks,  
Beth Haynes,

Debtors.

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CASE NO.: **09-69160-JRS**

CHAPTER: **13**

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies under penalty of perjury:

That I am more than 18 years of age, and that on this day, I served a copy of the within Debtors' Amendment to Chapter 13 Schedules, Summary of Schedules and Statistical Summary of Certain Liabilities and Related Data (28 U.S.C. Section 159) filed in this bankruptcy case upon the following by depositing a copy of same in U.S. Mail with sufficient postage affixed thereon to ensure delivery to:

**Adam Goodman  
Chapter 13 Trustee**

Suite 200  
260 Peachtree Street  
Atlanta, GA 30303

**Debtor:**

Brian Thomas Crooks  
26 Whitebark Lane  
Bluffton, SC 29909

**Co-Debtor:**

Beth Haynes  
26 Whitebark Lane  
Bluffton, SC 29909

**Creditors:**

Adorno & Yoss, LLC  
Two Midtown Plaza  
1349 W. Peachtree, Ste 1500  
Atlanta, GA 30309

**Afni, Inc.**

Attn: DP Recovery Support  
Po Box 3427  
Bloomington, IL 61702

**Allied Interstate Inc**

Gemb  
Po Box 103104  
Roswell, GA 90076

American Express  
c/o Becket and Lee  
Po Box 3001  
Malvern, PA 19355

Asset Acceptance  
Po Box 2036  
Warren, MI 48090

Bank Of America  
4060 Ogletown/Stanton Rd  
Newark, DE 19713

Capital 1 Bank  
Attn: C/O TSYS Debt  
Management  
Po Box 5155  
Norcross, GA 30091

Cardiology of Georgia  
P O Box 105527  
Atlanta, GA 30348

Chase  
Attn: Bankruptcy Dept  
Po Box 100018  
Kennesaw, GA 30156

Chase Na  
Attn: Bankruptcy Dept  
Po Box 100018  
Kennesaw, GA 30156

Countrywide Home Lending  
Attention: Bankruptcy SV-314B  
Po Box 5170  
Simi Valley, CA 93062

Discover Fin Svcs Llc  
Po Box 15316  
Wilmington, DE 19850

Fairlife Condo Assoc., Inc

First National Bank of Marin/Credit Fulton County Tax Commissioner

3405 Piedmont Road  
Suite 300  
Atlanta, GA 30305

One  
Customer Service  
Po Box 98873  
Las Vegas, NV 89193

1113 Fulton Co. Gov. Center  
141 Pryor Street, SW  
Atlanta, GA 30303

Georgia Department of Revenue  
Field Service  
PO Box 161108  
Atlanta, GA 30321

Green Point Savings  
Po Box 84013  
Columbus, GA 31908

Internal Revenue Service  
401 W. Peachtree Street  
Stop 334-D  
Atlanta, GA 30370

Lvnv Funding Llc  
Po Box 740281  
Houston, TX 77274

Macys/fdsb  
9111 Duke Blvd  
Mason, OH 45040

NCO Financial Systems  
507 Prudential Rd  
Horsham, PA 19044

Pinnacle Credit Servc  
Po Box 640  
Hopkins, MN 55343

Portfolio Rc  
Attn: Bankruptcy  
120 Corporate Blvd Suite 100  
Norfolk, VA 23502

Rjm Acq Llc  
575 Underhill Blvd Ste 2  
Syosset, NY 11791

Verizon Wireless  
Po Box 3397  
Bloomington, IL 61702

Weinstock & Scavo, PC  
3405 Piedmont Road, Suite 300  
Atlanta, GA 30305

Dated: Wednesday, May 25, 2011

/s/

The Sandberg Law Firm, LLC  
Kristopher Key, Clerk  
229 Peachtree Street  
International Tower, Suite 705  
Atlanta, GA 30303  
(404)827-9799

United States Bankruptcy Court  
Northern District of GeorgiaIn re:  
Brian Thomas Crooks  
Beth Haynes  
DebtorsCase No. 09-69160-jrs  
Chapter 13**CERTIFICATE OF NOTICE**

District/off: 113E-9

User: Hallc  
Form ID: pdf589aPage 1 of 2  
Total Noticed: 58

Date Rcvd: May 26, 2011

Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on May 28, 2011.

aty A. Michelle Hart, McCalla, Raymer, Padrick et al, 1544 Old Alabama Road,  
Roswell, GA 30076-2102

aty +Alane A. Becket, Becket & Lee, LLP, 16 General Warren Blvd., Malvern, PA 19355-1245

aty +Maria A. Tsagaris, McCalla Raymer, et al, 1544 Old Alabama Road, Roswell, GA 30076-2102

aty +Richard S. Ralston, Weinstein & Riley, P.S., 2001 Western Avenue, Suite 400,  
Seattle, WA 98121-3132

cr +Countrywide Home Loans Servicing, L.P., McCalla, Raymer, et al., Bankruptcy Department,  
1544 Old Alabama Road, Roswell, GA 30076-2102

cr +PRA Receivables Management LLC, POB 41067, Norfolk, VA 23541-1067

11480870 +90 Fairlie Condominium Association, Inc., Weinstock & Scavo, P.C., c/o Steven M. Winter, Esq.,  
3405 Piedmont Road, Suite 300, Atlanta, GA 30305-1728

11480858 +Adorno & Yoss, LLC, Two Midtown Plaza, 1349 W. Peachtree, Ste 1500, Atlanta, GA 30309-2929

11480860 +Allied Interstate Inc, Gemb, Po Box 103104, Roswell, GA 30076-9104

11480861 +American Express, c/o Becket and Lee, Po Box 3001, Malvern, PA 19355-0701

11919849 American Express Bank FSB, c/o Becket and Lee LLP, POB 3001, Malvern PA 19355-0701

11601462 +BAC Home Loans Servicing, L.P., fka Countrywide Home Loans Servicing, L.,  
7105 Corporate Drive, Mail Stop PTX-C-35, Plano, TX 75024-4100

11480863 Bank Of America, 4060 Ogletown/Stanton Rd, Newark, DE 19713

12612041 +CANDICA L.L.C., C O WEINSTEIN AND RILEY, PS, 2001 WESTERN AVENUE, STE 400,  
SEATTLE, WA 98121-3132

11763060 ++CAPITAL ONE, PO BOX 30285, SALT LAKE CITY UT 84130-0285  
(address filed with court: CAPITAL ONE BANK (USA), N.A., C/O TSYS DEBT MANAGEMENT (TDM),  
PO BOX 5155, NORCROSS, GA 30091)

11480864 ++CAPITAL ONE, PO BOX 30285, SALT LAKE CITY UT 84130-0285  
(address filed with court: Capital 1 Bank, Attn: C/O TSYS Debt Management, Po Box 5155,  
Norcross, GA 30091)

11480865 +Cardiology of Georgia, P O Box 105527, Atlanta, GA 30348-5527

11480866 +Chase, Attn: Bankruptcy Dept, Po Box 100018, Kennesaw, GA 30156-9204

11480867 +Chase Na, Attn: Bankruptcy Dept, Po Box 100018, Kennesaw, GA 30156-9204

11480868 +Countrywide Home Lending, Attention: Bankruptcy SV-314B, Po Box 5170,  
Simi Valley, CA 93062-5170

11654668 +Dyck-O'Neal, Inc., PO Box 13370, Arlington, TX 76094-0370

11654662 +Dyck-O'Neal, Inc., as Servicer for Federal National Mortgage, PO Box 13370,  
Arlington, TX 76094-0370

11654662 +Dyck-O'Neal, Inc. as Servicer, for Federal National Mortgage Assoc., PO Box 13370,  
Arlington, TX 76094-0370

11658406 +Dyck-O'Neal, Inc., PO Box 13370, Arlington, TX 76094-0370

11521003 FDS BANK/MACYS, TSYS DEBT MGMT., INC., PO BOX 137, COLUMBUS, GA 31902-0137

11480871 +First National Bank of Marin/Credit One, Customer Service, Po Box 98873,  
Las Vegas, NV 89193-8873

11480872 +Fulton County Tax Commissioner, 1113 Fulton Co. Gov. Center, 141 Pryor Street, SW,  
Atlanta, GA 30303-3444

11480874 +Green Point Savings, Po Box 84013, Columbus, GA 31908-4013

11480875 ++INTERNAL REVENUE SERVICE, CENTRALIZED INSOLVENCY OPERATIONS, PO BOX 7346,  
PHILADELPHIA PA 19101-7346  
(address filed with court: Internal Revenue Service, 401 W. Peachtree Street, Stop 334-D,  
Atlanta, GA 30370)

11486220 ++INTERNAL REVENUE SERVICE, CENTRALIZED INSOLVENCY OPERATIONS, PO BOX 7346,  
PHILADELPHIA PA 19101-7346  
(address filed with court: Internal Revenue Service, P. O. Box 21126, Philadelphia PA 19114)

11480877 +Macys/fdsb, 9111 Duke Blvd, Mason, OH 45040-8999

11480878 +NCO Financial Systems, 507 Prudential Rd, Horsham, PA 19044-2368

11784371 NCO PORTFOLIO MANAGEMENT, c/o Becket and Lee LLP, POB 3001, Malvern PA 19355-0701

11480880 ++PORTFOLIO RECOVERY ASSOCIATES LLC, PO BOX 41067, NORFOLK VA 23541-1067  
(address filed with court: Portfolio Rc, Attn: Bankruptcy, 120 Corporate Blvd Suite 100,  
Norfolk, VA 23502)

11521812 +PRA Receivables Management, LLC, As Agent Of Portfolio Recovery Assocs., POB 41067,  
NORFOLK VA 23541-1067

11480879 +Pinnacle Credit Servivc, Po Box 640, Hopkins, MN 55343-0640

13633741 Portfolio Recovery Associates, LLC, Po Box 41067, Norfolk VA 23541

11480881 +Rjm Acq Llc, 575 Underhill Blvd Ste 2, Syosset, NY 11791-3426

11480883 +Weinstock & Scavo, PC, 3405 Piedmont Road, Suite 300, Atlanta, GA 30305-1728

12666070 eCAST Settlement Corporation, POB 35480, Newark NJ 07193-5480

Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center.

tr +E-mail/Text: bnc@13trusteeatlanta.com May 26 2011 21:14:01 Adam M. Goodman,  
Adam M. Goodman, 13 Trustee, Suite 200, 260 Peachtree Street, Atlanta, GA 30303-1236

cr E-mail/PDF: gecsed@recoverycorp.com May 26 2011 22:55:47 GE Money Bank,  
c/o Recovery Management Systems Corp., Attn: Ramesh Singh, 25 SE 2nd Avenue, Suite 1120,  
Miami, FL 33131-1605

11480859 +E-mail/PDF: recoverybankruptcy@afninet.com May 26 2011 22:55:08 Afni, Inc.,  
Attn: DP Recovery Support, Po Box 3427, Bloomington, IL 61702-3427



District/off: 113E-9

User: Hallc  
Form ID: pdf589a

Page 2 of 2  
Total Noticed: 58

Date Rcvd: May 26, 2011

Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center (continued)

11480862	+E-mail/Text: BANKRUPTCY@ASSETACCEPTANCE.COM May 26 2011 21:28:12	Asset Acceptance,
	Po Box 2036, Warren, MI 48090-2036	
11885981	+E-mail/Text: BANKRUPTCY@ASSETACCEPTANCE.COM May 26 2011 21:28:12	Asset Acceptance LLC,
	assignee FIRST USA PLATINUM, PO Box 2036, Warren MI 48090-2036	
11494623	E-mail/PDF: mrdiscen@discoverfinancial.com May 26 2011 22:55:35	DISCOVER BANK,
	DFS SERVICES LLC, PO BOX 3025, NEW ALBANY, OHIO 43054-3025	
11480869	+E-mail/PDF: mrdiscen@discoverfinancial.com May 26 2011 22:55:35	Discover Fin Svcs Llc,
	Po Box 15316, Wilmington, DE 19850-5316	
11556613	E-mail/PDF: gecsed@recoverycorp.com May 26 2011 22:55:47	GE Money Bank,
	c/o Recovery Management Systems Corp., 25 SE 2nd Avenue, Suite 1120, Miami, FL 33131-1605	
11480873	E-mail/Text: brnotices@dor.ga.gov May 26 2011 21:30:21	Georgia Department of Revenue,
	Field Service, PO Box 161108, Atlanta, GA 30321	
11706133	E-mail/Text: resurgentbknotifications@resurgent.com May 26 2011 21:27:34	LVNV Funding LLC,
	Resurgent Capital Services, PO Box 10587, Greenville, SC 29603-0587	
11900968	E-mail/Text: resurgentbknotifications@resurgent.com May 26 2011 21:27:34	
	LVNV Funding LLC its successors and assigns as, assignee of MHC Receivables, LLC,	
	Resurgent Capital Services, PO Box 10587, Greenville, SC 29603-0587	
11480876	+E-mail/Text: resurgentbknotifications@resurgent.com May 26 2011 21:27:34	Lvnv Funding Llc,
	Po Box 740281, Houston, TX 77274-0281	
11549748	E-mail/PDF: rmscedi@recoverycorp.com May 26 2011 22:55:47	
	Recovery Management Systems Corporation, 25 S.E. 2nd Avenue, Suite 1120,	
	Miami, FL 33131-1605	
11824288	E-mail/PDF: BNCEmails@blinellc.com May 27 2011 01:27:03	Roundup Funding, LLC, MS 550,
	PO Box 91121, Seattle, WA 98111-9221	
13635262	E-mail/Text: resurgentbknotifications@resurgent.com May 26 2011 21:27:34	
	SHERMAN ACQUISITION LLC, PO Box 10587, Greenville SC 29603-0587	
11486221	+E-mail/Text: usagan.bk@usdoj.gov May 26 2011 21:30:48	U. S. Attorney,
	600 Richard B. Russell Bldg., 75 Spring Street, SW, Atlanta GA 30303-3315	
11480882	+E-mail/PDF: bankruptcyverizonwireless@afninet.com May 26 2011 22:55:09	Verizon Wireless,
	Po Box 3397, Bloomington, IL 61702-3397	
11965238	+E-mail/PDF: bankruptcyverizonwireless@afninet.com May 26 2011 22:55:09	Verizon Wireless South,
	PO Box 3397, Bloomington, Il 61702-3397	

TOTAL: 18

\*\*\*\*\* BYPASSED RECIPIENTS (undeliverable, \* duplicate) \*\*\*\*\*

cr*	+CANDICA L.L.C., C O WEINSTEIN AND RILEY, PS, 2001 WESTERN AVENUE, STE 400,
	SEATTLE, WA 98121-3132
cr*	ECAST Settlement Corporation, POB 35480, Newark, NJ 07193-5480
11888586*	+Asset Acceptance LLC, PO Box 2036, Warren MI 48090-2036

TOTALS: 0, \* 3, ## 0

Addresses marked '+' were corrected by inserting the ZIP or replacing an incorrect ZIP.  
USPS regulations require that automation-compatible mail display the correct ZIP.

Addresses marked '++' were redirected to the recipient's preferred mailing address  
pursuant to 11 U.S.C. 342(f)/Fed.R.Bank.PR.2002(g)(4).

**I, Joseph Speetjens, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.**

**Meeting of Creditor Notices only (Official Form 9): Pursuant to Fed. R. Bank. P. 2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.**

Date: May 28, 2011

Signature:

